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USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/18/07

December 17, 2007

Via Facsimile (212) 805-6326

Honorable Colleen McMahon
 United States District Judge
 Daniel Patrick Moynihan Courthouse
 500 Pearl Street, Room 640
 New York, New York 10007

Re: U.S. v. Charles Garland
07 CR 765 (CM)

MEMO ENDORSED

12/18/2007
*Modifications
 granted
 C.J.*

Dear Judge McMahon:

I represent defendant Charles Garland in the above matter. Mr. Garland is charged with 18 U.S.C. § 2252A (a)(5)(B). He was released on a \$150,000 PRB. Mr. Garland is presently on home detention with electronic monitoring and is being supervised by USPTSO Jason Lerman. His travel is currently restricted to the Southern and Eastern Districts of New York, the District of New Jersey, and the District of Connecticut.

I am respectfully requesting that Mr. Garland be permitted to travel to his mother's home in Bourne, Massachusetts by car to spend the Christmas holiday with his family. Specifically, Mr. Garland is requesting that he be permitted to leave New York on Sunday morning, December 23, 2007 and return on the evening of December 26, 2007. During this trip, he will be staying at his mother's home. If this request is granted, Mr. Garland will provide Pre-trial Services with the specific address of where he will be staying and all pertinent contact information.

I am also requesting a modification of Mr. Garland's bail conditions to allow him to travel to the Eastern District of Pennsylvania, as needed, in conjunction with possible business opportunities or activities related to the sale of his novelty item designs. Specifically, Mr. Garland has been negotiating a manufacturing and distribution deal with a company called Kalan L.P. that is located in Lansdowne, Pennsylvania. In order to pursue these opportunities, Mr. Garland would need to occasionally meet with Kalan and

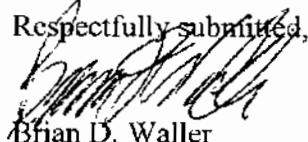
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visit their facilities in Pennsylvania. Of course, if this request is granted, any actual travel would first be subject to approval from Pre-trial Services.

Finally, Mr. Garland has recently obtained an employment position as a business development executive at Connex International. In order to perform his job duties, Mr. Garland would be required to access the Internet from his work computer to research clients, technology firms, and employee benefit managers. Your Honor has previously granted limited privileges permitting Mr. Garland to access the Internet from his personal computer, but that Order would not cover Internet research pertaining to his work. I am therefore respectfully requesting a modification of Mr. Garland's bail conditions to allow him to access the Internet from work computers. The computers that would be used are desktops connected to a secure and monitored company network.

I have discussed these requests with AUSA Todd Blanche and Pre-trial Services Officer Jason Lerman who have no objections.

Thank you for your attention to this matter. Please do not hesitate to contact me if you require additional information.

Respectfully submitted,

Brian D. Waller

cc: AUSA Todd Blanche
USPTSO Jason Lerman